

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|  |   |                            |
|--|---|----------------------------|
| VISHVA DESAI, on behalf of herself and | ) |                            |
| others similarly situated, et al.      | ) |                            |
|  | ) |                            |
| Plaintiffs,                            | ) | Honorable Elaine E. Bucklo |
|  | ) |                            |
| v.                                     | ) | Case No.: 1:11-cv-01925    |
|  | ) |                            |
| ADT SECURITY SERVICES, INC., et. al.   | ) | Magistrate Judge Keys      |
|  | ) |                            |
| Defendants.                            | ) |                            |

**ELEPHANT GROUP, INC.’S RESPONSES TO THIRD PARTY PLAINTIFF  
ADT’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Now Comes Third Party Defendant The Elephant Group, Inc., (“Elephant Group”) through undersigned counsel, and in response to Third Party Plaintiff’s First Request for Production of Documents, states as follows:

**REQUESTS FOR PRODUCTION**

1. All contracts, agreements, proposals, work orders, or understandings between You and ADT, including any modifications, revisions, addendums, amendments or change orders thereto.

**RESPONSE: Objection; this request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Objecting further, the information requested is equally available to and already in the possession of ADT. Without waiving these objections and subject thereto, see the Agreement dated May 28, 2008. Investigation continues.**

17. All contracts, agreements, proposals, work orders, or understandings between You and Paramount, including any modifications, revisions, addendums, amendments or change orders thereto concerning the marketing of ADT products or services.

**RESPONSE: Objection; this request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Responding further, relevant documents regarding Paramount Media Group have previously been produced in this matter.**

18. All documents concerning negotiations or communications between You and Paramount relating to the marketing of ADT products or services.

**RESPONSE: Objection; this request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Responding further, relevant documents regarding Paramount Media Group have previously been produced in this matter.**

19. All documents concerning or constituting communications between You and Paramount relating to EMI.

**RESPONSE: Objection; this request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Responding further, relevant documents regarding Paramount Media Group have previously been produced in this matter.**

20. All documents concerning or constituting communications between You and Paramount relating to this Lawsuit.